



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OFFICE OF PESTICIDE PROGRAMS
REGISTRATION DIVISION (7505P)

DP BARCODE No.: D413933 **REG. No. /File Symbol No.** 79533-6 **PRODUCT NAME:** Insect Guard
"25 S" Aerosol **Code(s):** 080301 **Decision No.** 476043 **Action Code:** R340 **Food Use:** NO [X]

DATE OUT: 02/04/14

SUBJECT: End Use Product Chemistry Review
Product Name: Insect Guard "25 S" Aerosol

FROM: Indira Gairola, Product Chemistry Team
Technical Review Branch / Registration Division (7505P)

TO: Carmen Rodia / Richard Gebken PM 10
Insecticide Branch / Registration Division (7505P)

Company Name: Wisconsin Pharmacal Co., LLC
Formulation Type Insecticide (pressurized liquid)

INTRODUCTION:

The registrant submitted an application for amendment of the end use product Insect Guard "25 S" Aerosol. Registrant is submitting product chemistry data with (MRID # 490612-01 to -02). Applicant is submitting updated basic CSF dated 09/30/13 for the proposed subject product since the product was transferred from another company.

TRB has been asked to determine the acceptability of the aforementioned product chemistry data and CSF.

SUMMARY OF FINDINGS:

1. Name of Active Ingredient(s): Diethyl toluamide (25.0%).
2. Has the registrant claimed substantial similarity to a registered product?
No [X] Yes [] [] NA; if yes give the registration number of the cited product.
3. All of the source materials of the active ingredient are derived from registered sources-
[X] Yes [] No
4. All inert ingredients have been screened by IIAB and found to be approved for the proposed labeled food uses.

5. Confidential Statement of Formula(s):

☒ Proposed Basic dated 09/30/13 ☐ Resubmitted date:

☐ Proposed Alternate Proposed Alternate comply with 40CFR§152.43: ☐ Yes; ☐ No ☒ [NA]

6. Product label

- a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concurs with product label (PR Notice 91-2)

☒ Yes; ☐ No; if not, explain below:

Is the sub statement in compliance with PR Notice 97-6 (inert ingredient vs. other ingredient?)

☒ Yes; ☐ No; if not, explain below:

Metallic equivalent:	<input checked="" type="checkbox"/> NA
Isomeric ratios	<input checked="" type="checkbox"/> NA
Soluble Arsenic	<input checked="" type="checkbox"/> NA
Acid Equivalent	<input checked="" type="checkbox"/> NA

- b. Health related sub statements: Product contains?

Petroleum distillate at > 10%:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Methanol at > 4%:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA
Sodium nitrate/Sodium nitrite:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> NA

- c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?

☒ Yes No ☐

Is the sub statement in compliance with PR Notice 98-6 (Total Release Fogger)?

☐ Yes, ☐ No; ☒ NA; if not, explain below:

- d. Label requires an additional Storage and Disposal statement: ☐ Yes ☒ No; if yes Explain below:

7 Group A: Product Chemistry Data: TRB's determination of the acceptability of the data for the proposed product is listed in the tables below:

Guideline No.	Study Title		Data submitted		TRB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	490612-01
830.1600	Description of materials used to produce the product		X		A	490612-01
830.1650	Description of formulation process		X		A	490612-01
830.1670	Discussion on the formation of impurities		X		A	490612-01
830.1700	Preliminary analysis			NA		CSF 09/30/13
830.1750	Certified limits (158.350)	Standard certified Limits	X		A	
		Proposed Limits			A	
		Justification for wider limits				
830.1800	Enforcement analytical method			X	A	490612-02

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress, NA = Not Applicable, U = Upgradeable.

8. Group B:

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos.
830.6303	Physical State	pressurized liquid	A	490612-01
830.6315	Flammability	55°F@13°C (CSF) 32 cms. flame extension)	A	490612-01
830.6314	Oxi/ Red	Not stated	NA	
830.6316	Explosability	Not stated	NA	
830.7000	pH	6.16 (dilution w/w 1%)	A	490612-01
830.7100	Viscosity	4.549 centistokes (20°C) 2.333 " " (40°C)	A	490612-01
830.7300	Density (units)	0.940 g/mL, (20°C) 1.019 " " ± 0.005 g/mL (CSF)	A	490612-01

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CONCLUSIONS:

TRB has reviewed the basic CSF dated 09/30/13 and product chemistry data corresponding to guideline 830 series, group A & group B for the proposed subject product Insect Guard "25 S" Aerosol and concluded

1. The aforementioned CSF for the subject product and data corresponding to 830 series group A Guideline (product identity and composition) are acceptable.
2. Data submitted corresponding to 830 series group B product chemistry are acceptable.
3. Data submitted corresponding to 830 series group B product chemistry data are acceptable. Applicant has submitted data for one-year storage stability (guideline 830.6317) and corrosion characteristics (guideline 830.6320) studies. The results from both study types are acceptable; observations were made at 0, 3, 6, 7, 10 and 12 month intervals (MRID #490612-02).
4. The proposed label was screened as it pertains to the product chemistry requirements.
5. The final review of the proposed label and uses are the purview of the PM team.